New Requirements for Veterinary Prescriptions for Controlled Substances and Gabapentin

This email is being sent to all veterinarians who are licensed with the Minnesota Board of Veterinary Medicine.

In collaboration with the Minnesota Board of Pharmacy the following changes to prescription requirements are being instituted to enable a more effective identification of veterinary prescriptions reported to the Minnesota Prescription Monitoring Program (PMP) database. Minnesota Statute 156.16 defines "prescription" as an order from a veterinarian to a pharmacist or another veterinarian authorizing the dispensing of veterinary drugs, human drugs for extra-label use, or over-the-counter drugs for extra-label use to a client for use on or in a patient.

Effective 10/1/2020 changes will occur in which animal prescriptions presented to pharmacies are reported to the MN PMP. The instruction for what needs to be reported to the MN PMP is based on the Board of Pharmacy's interpretation of Minnesota Statute 152.126, and will have an impact on veterinarians, both when prescribing controlled substances or gabapentin prescriptions, and when searching the PMP database.

In the information to follow, the term "client" means the owner or caretaker of the animal who arranges for the animal's veterinary care. Additionally, "controlled substance" refers to products as defined in Minnesota Statute 152.126 and includes butalbital and gabapentin. Gabapentin is not a controlled substance in the State of Minnesota but must be reported to the PMP database.

Actions Required:

Veterinarians should be prepared to include the following **additional** information on the prescription when prescribing controlled substances, as defined in M.S. 152.126, which includes **gabapentin** prescriptions:

- The animal's name
- The client's first name, last name, date of birth (DOB), and gender
- The veterinarian's state license number (e.g. if the prescription is for gabapentin).

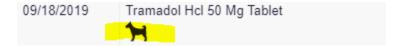
NOTE: The pharmacist's software requires FIVE digits for the veterinarian's license number. You must add a **zero** at the front of your license number if it is less than four digits. If the license includes the letter C, include the C.

Examples: License number 6416 would be written on the prescription as **0**6416. License number C219 would be written on the prescription as **0**C219.

Note: Per M.S. 156.18, veterinarians are already required to provide the following information on a prescription: address of the veterinarian, and if written, the signature; address of the client; species; name, strength, and quantity of the drug; date of issue, directions for use; withdrawal time for food animals; expiration date of the prescription; and number of refills. Per 21 CFR 1306.05 (a), controlled substance prescriptions must bear the name, address, and registration number of the prescriber.

By associating an animal's prescription with its current owner/caretaker in the PMP, insight may be gained if a client is changing the animal's name in an attempt to mislead veterinarians or to mix the

animal's controlled substance prescriptions with their own. For those who search the MN PMP database, an animal icon will appear on the PMP report to differentiate animal prescriptions from human prescriptions.



For veterinarians who search the PMP database:

When searching the PMP database, it is important to note that veterinarians and veterinary delegates only have access to the prescription data for the client's animal(s). Veterinarians and their delegates have a restricted view so that the client's prescription data will not appear. As aforementioned, an animal icon will appear to indicate the prescription is for an animal. Upon hovering over the icon, the name of the animal will display. During the transition phase of 10/1/2020 to 3/31/2021, if you are needing to assess a veterinary patient's PMP report, it is worthwhile to search in both manners [e.g. (1) search by using the animal's first name, client's last name, animal's date of birth; as well as (2) the client's first name, client's date of birth]. Upon the implementation date of 3/31/2021, searching by the client's first name, last name, and DOB should suffice, so long as all dispensers are able to execute the update in reporting requirements by the stated date.

For more information:

- Additional instruction regarding some questions the Boards of Veterinary Medicine and Pharmacy have received to date can be found here: https://mn.gov/boards/veterinary-medicine/
- Questions regarding MN PMP account creation or database queries can be directed to PMP staff at Minnesota.pmp@state.mn.us or 651-201-2836, option zero.
- Additional questions regarding this communication can be directed to Board of Veterinary Medicine staff at vet.med@state.mn.us or 651-201-2844.

The Boards of Veterinary Medicine and Pharmacy thank you for your efforts in making the change in reporting to the MN PMP database a seamless transition.